

1 MARNI RUBIN-WATKINS, ESQ.  
Nevada Bar No. 9674  
2 FIDELITY NATIONAL LAW GROUP  
1701 Village Center Circle, Suite 110  
3 Las Vegas, Nevada 89134  
Telephone: (702) 667-3000  
4 Fax: (702) 243-3091  
Email: [marni.watkins@fnf.com](mailto:marni.watkins@fnf.com)  
5 Attorneys for Plaintiff  
LeaderOne Financial Corporation  
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8 UNITED STATES DISTRICT  
9 DISTRICT OF NEVADA

10 LEADERONE FINANCIAL CORPORATION,

11 Plaintiff,

12 vs.

13 US DEPARTMENT OF JUSTICE; JOSEPH H.  
RAMIREZ; DOES I through X; and ROE  
CORPORATIONS I through X,

14 Defendants.  
15

Case No. 2:18-cv-02138-KJD-CWH

STIPULATION AND ORDER TO  
STAY CASE PENDING  
SETTLEMENT NEGOTIATIONS

16 COME NOW Plaintiff LEADERONE FINANCIAL CORPORATION  
17 ("LEADERONE"), by and through their attorney of record, Marni Rubin Watkins, Esq. of  
18 Fidelity National Law Group; Defendant US DEPARTMENT OF JUSTICE ("DOJ"), by and  
19 through their attorney of record, Mark E. Woolf, Esq.; and Defendant JOSEPH H. RAMIREZ  
20 ("RAMIREZ"), by and through his attorney of record Elizabeth S. Ashley, Esq. of Ashley Law  
21 (collectively, "Responding Defendants"), and hereby stipulate and agree as follows:  
22

- 23 1. All parties held a conference call on December 4, 2018 to discuss settlement  
24 negotiations.  
25 2. WHEREAS the parties have agreed to stay the case for sixty (60) days to allow for  
26 meaningful settlement discussions.  
27

28 NOW THEREFORE the parties hereby stipulate and agree as follows:

1 IT IS HEREBY STIPULATED that this case is stayed for a period of sixty (60) days  
2 from the date that this Stipulation and Order is entered with the Court for the parties to conduct  
3 settlement discussions.

4 IT IS FURTHER STIPULATED that a further Joint Status Report will be provided to  
5 the court on or before February 4, 2019.

6 DATED this 6<sup>th</sup> day of December, 2018.

DATED this 6<sup>th</sup> day of December, 2018.

7 FIDELITY NATIONAL LAW GROUP

DAYLE ELIESON, ESQ.  
UNITES STATES ATTORNEY

8 /s/ Marni Rubin Watkins  
9 MARNI RUBIN WATKINS, ESQ.  
10 Nevada Bar Number 9674  
11 1701 Village Center Circle, Suite 110  
12 Las Vegas, NV 89134  
13 Attorneys for Plaintiff  
14 LeaderOne Financial Corporation

/s/ Mark E. Woolf  
MARK E. WOOLF, ESQ.  
Assistant United States Attorney  
501 Las Vegas Blvd. So., Ste. 1100  
Las Vegas, Nevada 89101  
Attorneys for Defendant  
United States

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1 DATED this 6<sup>th</sup> day of December, 2018.

2 ASHLEY LAW

3  
4 /s/ Elizabeth S. Ashley  
ELIZABETH S. ASHLEY, ESQ.  
5 Nevada Bar Number 7501  
2470 St. Rose Pkwy., Ste. 110  
6 Henderson, NV 89074  
Attorneys for Defendant  
7 *Joseph H. Ramirez*

8 **ORDER**

9 IT IS SO ORDERED.

10 DATED this 7 day of December, 2018.

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13 \_\_\_\_\_  
DISTRICT COURT JUDGE

14 Respectfully submitted by:

15 FIDELITY NATIONAL LAW GROUP

16  
17 /s/ Marni Rubin Watkins  
MARNI RUBIN WATKINS, ESQ.  
18 Nevada Bar Number 9674  
1701 Village Center Circle, Suite 110  
19 Las Vegas, NV 89134  
Attorneys for Plaintiff  
20 *LeaderOne Financial Corporation*